

**TIFFANY & BOSCO**  
P.A.

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Attorneys for Secured Creditor

10-02529

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE:

Amy Hunter Stephens and Warren Edward  
Stephens, Jr.

Debtors.

BAC Home Loan Servicing, L.P. fka Countrywide  
Home Loans Servicing, L.P.

Secured Creditor,

vs.

Amy Hunter Stephens and Warren Edward  
Stephens, Jr., Debtors; Dianne C. Kerns, Trustee.

Respondents.

No. 4:10-bk-00627-EWH

Chapter 13

OBJECTION TO CHAPTER 13 PLAN

BAC Home Loan Servicing, L.P. fka Countrywide Home Loans Servicing, L.P., a secured creditor, by its attorneys, TIFFANY & BOSCO, P.A., hereby objects to the proposed Chapter 13 Plan filed by the Debtor for the following reasons:

1. The Chapter 13 Plan does not adequately provide for repayment of arrearages owed to BAC Home Loan Servicing, L.P. fka Countrywide Home Loans Servicing, L.P., pursuant to the proof of

1 claim in the amount of \$13,897.16. Secured creditor requests that the arrearages as set forth in its Proof  
2 of Claim be paid through the Plan. A copy of Secured Creditor's Proof of Claim is attached hereto as  
3 Exhibit "A" and made a part hereof by this reference.

4 2. The Chapter 13 Plan filed with the Court does not provide to secured creditor repayment of  
5 its attorney fees incurred for bankruptcy and/or foreclosure proceedings. Secured creditor requests that the  
6 attorney fees as set forth in its Proof of Claim be paid through the Plan.

7 Secured Creditor will withdraw these objections when presented with a Stipulated Order  
8 Confirming Plan that provides for the arrearages, interest and fees as provided in the Proof of Claim and as  
9 stated above.

10 DATED this 2nd day of April, 2010.

11 Respectfully submitted,

12 TIFFANY & BOSCO, P.A.

13 BY /s/ MSB # 010167

14 Mark S. Bosco

15 Leonard J. McDonald

16 Attorneys for Secured Creditor

17 COPY of the foregoing mailed  
18 April 2, 2010 to:

19 Amy Hunter Stephens and Warren Edward Stephens, Jr.  
20 5600 E Territory Drive  
Tucson, AZ 85750  
Debtors

21 Kathryn L. Johnson  
22 2 E. Congress St., Ste 900  
Tucson, AZ 85701  
23 Attorney for Debtors

24 Dianne C. Kerns  
25 7320 N. La Cholla, #154  
PMB413  
Tucson, AZ 85741  
26 Trustee  
By: Ismael G. Solano